

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CAROLYN GREENE, Individually and On Behalf of
All Others Similarly Situated,

Plaintiff,

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BIOPURE CORPORATION, THOMAS A. MOORE,
CARL W. RAUSCH and RONALD F. RICHARDS.

Defendants,

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Civil Docket for Case No.:
1:03-CV-12628-NG

Hon. Nancy Gertner

(Additional captions on following pages)

NOTICE OF MOTION OF THE BHASKAR GROUP FOR APPOINTMENT
AS LEAD PLAINTIFF AND APPROVAL OF PROPOSED LEAD PLAINTIFF'S
SELECTION OF LEAD COUNSEL

JOHN G. ESPOSITO, On Behalf of Himself and
All Others Similarly Situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS A. MOORE,
CARL W. RAUSCH and RONALD F. RICHARDS,

Defendants.

MICHAEL E. CRIDEN, Individually and On Behalf of All
Others Similarly Situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS A. MOORE and
CARL W. RAUSCH,

Defendants.

JOSEPH L. KING, On Behalf of Himself and All Others
Similarly Situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS A. MOORE,
CARL W. RAUSCH and RONALD F. RICHARDS,

Defendants.

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) Civil Docket for Case No.:

) 1:04-CV-10013-NG

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) Hon. Nancy Gertner

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) Civil Docket for Case No.:

) 1:04-CV-10046-NG

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) Hon. Nancy Gertner

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) Civil Docket for Case No.:

) 1:04-CV-10038-NG

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) Hon. Nancy Gertner

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ISRAEL SHURKIN and SHARON SIURKIN,
Individually and On Behalf of All Others Similarly
Situating,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS A. MOORE and
CARL W. RAUSCH,

Defendants.

JAMES J. NIZZO, VIRGINIA C. NIZZO and CARLO
CILBERTI, On Behalf of Themselves and All Others
Similarly Situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS A. MOORE,
CARL W. RAUSCH and RONALD F. RICHARDS,

Defendants.

BARRY BROOKS,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS A. MOORE,
CARL W. RAUSCH and RONALD F. RICHARDS,

Defendants.

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Civil Docket for Case No.:
1:04-CV-10055-NG

Hon. Nancy Gertner

Civil Docket for Case No.:
1:04-CV-10065-NG

Hon. Nancy Gertner

Civil Docket for Case No.:
1:04-CV-10077-NG

Hon. Nancy Gertner

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ANASTASIOS PERILEGIS, Individually and On Behalf of)	
All Others Similarly Situated,)	
)	Civil Docket for Case No.:
Plaintiff,)	1:04-CV-10078-NG
)	
v.)	
)	
BIOPURE CORPORATION, THOMAS A. MOORE,)	Hon. Nancy Gertner
CARL W. RAUSCH and RONALD F. RICHARDS,)	
)	
Defendants.)	
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MARTIN WEBER, On Behalf of Himself and All Others)	
Similarly Situated,)	
)	Civil Docket for Case No.:
Plaintiff,)	1:04-CV-10090-NG
)	
v.)	
)	
BIOPURE CORPORATION, THOMAS A. MOORE,)	Hon. Nancy Gertner
CARL W. RAUSCH and RONALD F. RICHARDS,)	
)	
Defendants.)	
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BRUCE HAIMS, Individually and On Behalf of)	
All Others Similarly Situated,)	
)	Civil Docket for Case No.:
Plaintiff,)	1:04-CV-10144-NG
)	
v.)	
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BIOPURE CORPORATION, THOMAS A. MOORE,)	Hon. Nancy Gertner
CARL W. RAUSCH and RONALD F. RICHARDS,)	
)	
Defendants.)	
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MODEL PARTNERS LIMITED, Individually and On)	x
Behalf of All Others Similarly Situated,)	
)	
Plaintiff,)	Civil Docket for Case No.:
)	1:04-CV-10155-NG
)	
v.)	
)	
BIOPURE CORPORATION, THOMAS A. MOORE,)	Hon. Nancy Gertner
CARL W. RAUSCH and RONALD F. RICHARDS,)	
)	
Defendants.)	
)	
)	
)	x

JUNE E. PATENAUDE, Individually and On Behalf of)	x
All Others Similarly Situated,)	
)	
Plaintiff,)	Civil Docket for Case No.:
)	1:04-CV-10179-NG
)	
v.)	
)	
BIOPURE CORPORATION, THOMAS A. MOORE,)	Hon. Nancy Gertner
CARL W. RAUSCH and RONALD F. RICHARDS,)	
)	
Defendants.)	
)	
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)	x

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W. KENNETH JOHNSON, On Behalf of Himself and All)	
Others Similarly Situated,)	
)	Civil Docket for Case No.:
Plaintiff,)	1:04-CV-10190-NG
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v.)	
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BIOPURE CORPORATION, THOMAS A. MOORE,)	Hon. Nancy Gertner
CARL W. RAUSCH and RONALD F. RICHARDS,)	
)	
Defendants.)	
)	
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NANCY L. PINCKNEY and GERTRUDE PINCKNEY,)	
Individually and On Behalf of All Others Similarly)	
Situated,)	Civil Docket for Case No.:
)	1:04-CV-10189-NG
Plaintiff,)	
)	
v.)	
)	Hon. Nancy Gertner
BIOPURE CORPORATION, THOMAS A. MOORE and)	
CARL W. RAUSCH,)	
)	
Defendants.)	
)	
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GREGORY KRUSZKA, On Behalf of Himself and All)	
Others Similarly Situated,)	
)	Civil Docket for Case No.:
Plaintiff,)	1:04-CV-10202-NG
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v.)	
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BIOPURE CORPORATION, THOMAS A. MOORE,)	Hon. Nancy Gertner
CARL W. RAUSCH and RONALD F. RICHARDS,)	
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Defendants.)	
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PLEASE TAKE NOTICE that the Bhaskar Group ("Movant"), as defined in the accompanying Memorandum of Law, respectfully moves this Honorable Court to issue an order pursuant to Section 27 of the Securities Act of 1933, 15 U.S.C. § 77z-1; Section 21D(a)(3) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3), and Rule 42 of the Federal Rules of Civil Procedure: (i) consolidating the above-captioned related actions, (ii) appointing Movant as Lead Plaintiff in the consolidated action, and (iii) approving Movant's selection of Goodkind Labaton Rudoff & Sucharow LLP as Lead Counsel for the class.

The grounds for this motion are stated in the Memorandum of Law in Support of this Motion and the Declaration of Christopher Keller and accompanying exhibits submitted herewith.

A copy of this Notice has been sent to all parties on the attached proof of service.

Dated: March 1, 2004

Respectfully submitted,

GILMAN AND PASTOR, LLP



Peter Lagorio (BBO #567379)
Stonehill Corporate Center
999 Broadway, Suite 500
Saugus, MA 01906
Tel: (781) 231-7850
Fax: (781) 231-7840

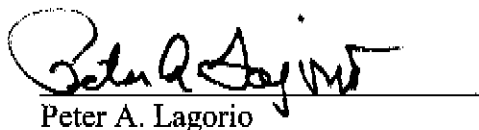
**GOODKIND LABATON RUDOFF
& SUCHAROW LLP**

Jonathan M. Plasse
Christopher J. Keller
100 Park Avenue
New York, New York 10017
Tel: (212) 907-0700
Fax: (212) 818-0477

*Attorneys for the Bhaskar Group
And Proposed Lead Counsel for the Class*

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of March 2004, I have caused a true and correct copy of the foregoing: Notice of Motion of the Bhaskar Group for Appointment as Lead Plaintiff and Approval of Proposed Lead Plaintiff's Selection of Lead Counsel, Memorandum of Law in Support of the Bhaskar Group for Appointment as Lead Plaintiff and Approval of Proposed Lead Plaintiff's Selection of Lead Counsel, Declaration of Christopher Keller in Support of Motion of the Bhaskar Group for Consolidation of Related Actions, Appointment as Lead Plaintiff and Approval of Proposed Lead Plaintiff's Selection of Lead Counsel, and [Proposed] Order Consolidating the Related Actions, Appointing the Bhaskar Group as Lead Plaintiff and Approving Lead Plaintiff's Selection of Lead Counsel, to be served via first class mail to all counsel on attached service list.


Peter A. Lagorio

Biopure Corporation Securities Litigation

Service List

Plaintiffs' Counsel

Samuel H. Rudman
Russell J. Gunyan
Cauley Geller Bowman & Rudman, LLP
200 Broadhollow Road, Suite 406
Melville, NY 11747

Marc A. Topaz
Schiffrin & Barroway, LLP
Three Bala Plaza East, Suite 500
Bala Cynwyd, PA 19004

Peter A. Lagorio
Gilman and Pastor, LLP
Stonehill Corporate Center
999 Broadway, Suite 500
Saugus, MA 01906

Jules Brody
Howard T. Longman
Stull, Stull & Brody
6 East 45th Street
New York, NY 10017

Nancy Freeman Gans
Moulton & Gans, P.C.
33 Broad Street, Suite 1100
Boston, MA 02109

Steven G. Schulman
Peter E. Seidman
Sharon M. Lee
Milberg Weiss Bershad Hynes & Lerach LLP
One Pennsylvania Plaza, 49th Floor
New York, NY 10119

Bruce G. Murphy
Law Offices of Bruce G. Murphy
265 Lywyds Lane
Vero Beach, FL 32963

Jeffrey C. Block
Patrick T. Egan
Berman Devalerio Pease Tabacco Burt
& Pucillo
One Liberty Square, 8th Floor
Boston, MA 02109

Steven J. Toll, Esq.
Julie Goldsmith, Esq.
Cohen, Milstein, Hausfeld & Toll, P.L.L.C.
1100 New York Avenue, N.W.
West Tower, Suite 500
Washington, D.C. 20005

Daniel L. Berger
Gerald L. Silk
Bernstein Litowitz Berger & Grossman LLP
1285 Avenue of the Americas
New York, NY 10019

Susan R. Strenger
Perkins Smith & Cohen, LLP
One Beacon Street, 30th Floor
Boston, MA 02108

Robert Harwood
Samuel K. Rosen
Wechsler Harwood LLP
488 Madison Avenue, 8th Floor
New York, NY 10022

Marc I. Gross
Pomerantz Haudek Block Grossman
& Gross LLP
100 Park Avenue, 26th Floor
New York, NY 10017

Charles Piven
Law Offices of Charles Piven
World Trade Center
401 E. Pratt Street, Suite 2525
Baltimore, MD 21202

Biopure Corporation Securities Litigation

Service List

Plaintiffs' Counsel

Richard J. Vita
Law Offices of Richard J. Vita
77 Franklin Street, 3rd Floor
Boston, MA 02110

Marvin L. Frank
Eric J. Belfi
Gregory B. Linkh
Rabin, Murray & Frank LLP
275 Madison Avenue, 8th Floor
New York, NY 10016

McI E. Lifshitz
Bernstein Leibhard & Lifshitz, LLP
10 East 40th Street
New York, NY 10016

Susan Salvetti
Shaye J. Fuchs
Zwerling, Schachter & Zwerling, LLP
845 Third Avenue
New York, NY 10022

John G. Emerson
Scott E. Poynter
Emerson Poynter LLP
P.O. Box 164810
Little Rock, AR 72216

Jeffrey S. Marks
Marks & Artau, P.A.
2499 Glades Road, Suite 308
Boca Raton, FL 33431

Mary T. Sullivan
Segal Roitman & Coleman
11 Beacon Street, Suite 500
Boston, MA 02108

George E. Barrett
Douglas S. Johnston, Jr.
Timothy L. Miles
Barrett, Johnston & Parsley
217 Second Avenue, North
Nashville, TN 37201

James G. Stranch
Branstetter Kilgore Stranch & Jennings
227 Second Avenue, North
Nashville, TN 37201

Deborah R. Gross, Esq.
Robert P. Fruitkin, Esq.
Law Offices of Bernard M. Gross, P.C.
1515 Locaust Street, 2nd Floor
Philadelphia, PA 19102

Arnold Levin, Esq.
Levin Fishbein Sedran & Berman
510 Walnut Street, Suite 500
Philadelphia, PA 19106

David Jaroslawicz, Esq.
Jaroslawicz and Jaros
150 William Street, 19th Floor
New York, NY 10038

Curtis V. Trinko
Law Offices of Curtis V. Trinko, LLP
16 West 46th Street, 7th Floor
New York, NY 10036

Laurence D. King
Kaplan Fox & Kilsheimer
555 Montgomery Street, Suite 1501
San Francisco, CA 94111

Biopure Corporation Securities Litigation

Service List

Plaintiffs' Counsel

Frederic S. Fox
Joel B. Strauss
Hae Sung Nam
Kaplan Fox & Kilsheimer
805 Third Avenue, 22nd Floor
New York, NY 10022

Mary T. Sullivan
Segal Roitman & Coleman
11 Beacon Street, Suite 500
Boston, MA 02108

Brian J. Robbins
Jeffrey P. Fink
Robbins Umeda & Fink, LLP
1010 Second Avenue, Suite 2360
San Diego, CA 92101

Richard A. Lockridge
Karen Hanson Reibel
Lockridge Grindal Nauen P.L.L.P.
100 Washington Avenue South
Suite 2200
Minneapolis, MN 55401

Jack G. Fruchter
Fruchter & Twersky
One Penn Plaza, Suite 1910
New York, NY 10019